

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Case No. 3:22 CV

Plaintiff,

REPORT OF PARTIES'
PLANNING MEETING

-vs-

JUDGE JACK ZOUHARY

Defendant.

1. Pursuant to Federal Civil Rule 26(f) and Local Rule 16.3(b), a meeting was held on _____, and was attended by:

_____ Counsel for Plaintiff _____

_____ Counsel for Defendant _____

2. The parties:
_____ Have exchanged the pre-discovery disclosures (the actual documents -- not just the list) required by Rule 26(a)(1) and the Case Management Conference (CMC) Notice; or

_____ Have permission from this Court to delay disclosure until after the CMC.

3. The parties recommend the following track:

_____ Expedited _____ Standard _____ Complex

_____ Administrative _____ Mass Tort

4. Trial Month/Year: _____ (15 months from filing if Standard Track)

5. This case _____ is / _____ is not suitable for a Settlement/Mediation Conference. If yes, indicate if Court assistance is desired and how soon:

_____ Shortly after CMC

_____ After key discovery

_____ Other [describe]

6. The parties _____do/ _____do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. 636(c).

If you are consenting to the jurisdiction of the Magistrate Judge, please contact Chambers (419-213-5675) **prior** to the CMC. A Consent to the Exercise of Jurisdiction will then be issued for signature by all parties and the case will be sent to the Magistrate Judge for the CMC and all further proceedings.

7. The parties agree that this case _____ does / _____ does not involve electronic discovery. **(Counsel are reminded to review the default standard for e-discovery set forth in Appendix K to the Local Rules.)**

8. Recommended Discovery Plan:

(a) Describe anticipated e-discovery (i.e., what ESI is available and where it resides; ease/difficulty and cost of producing information; schedule and format of production; preservation of information; agreements about privilege or work-product protection, etc.):

(b) Describe any anticipated discovery issues or potential problems:

9. Recommended cut-off for amending the pleadings and/or adding additional parties:

10. Expert disclosures:

(a) Names by: _____

(b) Reports by: _____

NOTE: Expert depositions require prior Court approval.

11. Discovery deadlines:

(a) Liability: _____

(b) Damages: _____

NOTE: Dispositive motions are not appropriate in every case. No dispositive motions shall be filed until counsel have met and conferred about the merits of such a motion; and only after sufficient discovery has been completed that allows counsel for the moving party to represent the belief there are no disputed issues of material fact. Timing for filing a motion is the responsibility of counsel and should not conflict with the case schedule and trial. *See Civil Case Management Procedures.*

12. Recommended month/date for: telephone status with Court, or Joint Status Report filed by counsel: _____

13. Other matters for this Court's attention: _____

Attorney for Plaintiff: _____ s/

Attorney for Defendant: _____ s/